

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE NATIONAL FOOTBALL  
PLAYERS' CONCUSSION  
INJURY LITIGATION

---

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Civ. Action No. 14 – 00029 – AB

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
Successor-in-interest to  
NFL Properties, Inc.,

Defendants

---

THIS DOCUMENT RELATES TO

All Actions

---

**DECLARATION OF ANTHONY TARRICONE PURSUANT TO  
THIS COURT'S ORDER DATED MARCH 28, 2018**

Anthony Tarricone, pursuant to 28 U.S.C 1746, declares the following is true and correct under penalty of perjury:

1. I am a partner at the law firm of Kreindler & Kreindler LLP, and I submit this declaration pursuant to the Order of this Court dated March 28, 2018 (Doc. No. 9833).

2. On April 26, 2012, in Case Management Order No. 2 (Doc. No. 64), this Court appointed me as a member of the Plaintiff's Steering Committee in this matter.

3. I hereby answer the questions put forth by the Court in its Order dated March 28, 2018, as follows:

- 1A. Kreindler & Kreindler LLP and associated attorneys previously represented 79 Settlement Class Members whom we no longer represent.
- 1B. Kreindler & Kreindler LLP and associated attorneys currently represent 169 Settlement Class Members.
- 2A. Five (5) Settlement Class Members currently represented by Kreindler & Kreindler LLP and associated attorneys have received a monetary award.
- 2B. One (1) Settlement Class Member currently represented by Kreindler & Kreindler LLP and associated attorneys has been informed by the Claims Administrator that he is entitled to receive a Monetary Award, but has not yet received that award because it has been appealed by the NFL.
- 2C. Ten (10) Settlement Class Members currently represented by Kreindler & Kreindler LLP and associated attorneys have applied for a Monetary Award. This number includes the class members in 2A and 2B above.
- 2D. I expect an additional 9 Settlement Class Members currently represented by Kreindler & Kreindler LLP and associated attorneys, who have not yet applied for a Monetary Award, to be eligible to receive a Monetary Award.
- 3. No Settlement Class Members currently represented by Kreindler & Kreindler LLP and associated attorneys have entered agreements to assign their rights to a Monetary Award. To the extent any Settlement Class Members formerly represented by Kreindler & Kreindler LLP and associated attorneys have entered into an agreement to assign their rights to

a Monetary Award it was done without my knowledge or the knowledge of any other attorney associated with Kreindler & Kreindler LLP.

4. Not applicable.
5. Neither I, nor any other attorney associated with my law firm, is obligated to pay or forward (directly or indirectly) any portion of a Settlement Class Member's Monetary Award to any third party litigation funder.
6. Neither I nor any other attorney associated with my law firm played any role in creating, promoting, or facilitating any Assignments by any Settlement Class Member.
7. Neither I, nor any attorney associated with Kreindler & Kreindler LLP or any individual or entity related to Kreindler & Kreindler LLP, have any direct or indirect (professional or personal) association with any of the third party litigation funders used by Settlement Class Members previously or currently represented by me, Kreindler & Kreindler LLP, or any attorney associated with Kreindler & Kreindler LLP.

8. Not applicable.

*[Remainder of Page Intentionally Left Blank]*

4. Since no Settlement Class Members currently represented by Kreindler & Kreindler, LLP, and no Settlement Class Members previously represented by Kreindler & Kreindler LLP (during the course of that representation) entered into any Assignment, neither I nor my law firm have any documents to submit that are responsive to the request for submission of documents set forth in this Court's Order dated March 28, 2018.

KREINDLER & KREINDLER, LLP

/s/ Anthony Tarricone  
Anthony Tarricone (MA BBO# 492480)  
855 Boylston Street  
Boston, MA 02116  
(617) 424-9100  
[atarricone@kreindler.com](mailto:atarricone@kreindler.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2018, I caused the foregoing document to be filed with the United States District Court for the Eastern District of Pennsylvania via the Court's CM/ECF system, which will provide electronic notice to all counsel and parties.

/s/ Anthony Tarricone